

# Exhibit A

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03/10/2025

**Notice of Service**

Return of Service.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**Corporation Served**

Document ID - 25-SMCC-1869; Served To - TRUMAN MEDICAL CENTER, INC.; Served Date - 02/27/2025; Served Time - 10:40:00; Service Type - SP; Reason Description - SERV; Service Text -DELIVERED A COPY OF SUMMONS TO AMANDA O'NEILL; Updated Service Text - Document ID - 25-SMCC-1869; Served To - TRUMAN MEDICAL CENTER, INC.; Served Date - 02/27/2025; Served Time - 10:40:00; Service Type - SP; Reason Description - SERV; Service Text -DELIVERED A COPY OF SUMMONS TO AMANDA O'NEILL

02/25/2025

**Summons Issued-Circuit**

Document ID: 25-SMCC-1869, for TRUMAN MEDICAL CENTER, INC..

**Order - Special Process Server**

02/21/2025

**Motion Special Process Server**

Motion for Appointment of Private Process Server.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

02/20/2025

**Correspondence Sent**

**Case Mgmt Conf Scheduled**

**Scheduled For:** 06/09/2025; 9:00 AM; PATRICK CHARLES EDWARDS; Jackson - Kansas City

02/17/2025

**Filing Info Sheet eFiling**

**Filed By:** SARAH JESSICA DUGGAN

**Motion Special Process Server**

Motion for Private Process Server.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**Summ Req-Circuit Pers Serv**

Request for Summons.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**Designation of Lead Attorney**

Designation of Lead Attorney of Record.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**Confid Filing Info Sheet Filed**

Civil Filing Information Sheet.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**CRIFS/Unredacted Document**

CRIF with Petition; CRIF Exhibit A; Exhibit B; Exhibit C in associated to Circuit Court filed on 02/17/2025.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**Associated Entries:** 02/17/2025 -

**Pet Filed in Circuit Ct**

+

**Pet Filed in Circuit Ct**

Petition; Exhibit A; Exhibit B; Exhibit C.

**Filed By:** SARAH JESSICA DUGGAN

**On Behalf Of:** STACIE MCCALL

**Associated Entries:** 02/17/2025 - CRIFS/Unredacted Document +

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

STACIE MCCALL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No: _____
	)	
TRUMAN MEDICAL CENTER, INC. D/B/A	)	
UNIVERSITY HEALTH – BEHAVIORAL	)	
HEALTH SERVICES	)	Division: _____
Serve: Registered Agent	)	
Justus, Jolie L.	)	
2301 Holmes Street	)	
Kansas City, MO 64108	)	
	)	
Defendant.	)	

**PETITION FOR DAMAGES**

COMES NOW Plaintiff Stacie McCall, by and through her undersigned counsel, and for her petition against Defendant, Truman Medical Center, Inc. d/b/a University Health – Behavioral Health Services (hereinafter “Defendant”), states and alleges as follows:

**Overview of Action**

1. The actions of Defendant violated the Missouri Human Rights Act, RSMo. § 213.010 *et seq.* (“MHRA”), in that Defendant discriminated against Plaintiff due to her disability and retaliated against her when she reported the same; Missouri’s Whistleblower Protection Act, RSMo. Chapter 285.575, and Retaliation Under the False Claims Act, 31 U.S.C. § 3730(h), in that Plaintiff reported Medicaid fraud and was asked to participate in the fraud but refused and was retaliated against for her protected activity.

**Parties**

2. Plaintiff is an individual who was an employee of Defendant.

3. Defendant, Truman Medical Center d/b/a/ University Health – Behavioral Health Services is a corporation organized under the laws of the State of Missouri and is registered to do business in the State of Missouri. At all relevant times herein, Defendant had ownership, management, and operational control interest in its location at 300 W 19<sup>th</sup> Terrace Kansas City, MO 64108.

4. At all times pertinent to this Petition, Plaintiff was an employee within the meaning of the MHRA.

5. At all times pertinent to this Petition, Defendant was an employer governed by the MHRA.

### **Jurisdiction and Venue**

6. Defendant employed Plaintiff at its location in Jackson County, Missouri.

7. Defendant engaged in discriminatory conduct in violation of the MHRA in Jackson County, Missouri.

8. Plaintiff was first injured by Defendant's unlawful conduct in Jackson County, Missouri.

9. This Court has personal jurisdiction over Defendant, pursuant to Missouri Rule of Civil Procedure 54.13(b)(3) because Defendant are domestic corporations subject to service of process by delivering a copy of the summons and petition to an officer, partner, or managing or general agent, or by leaving the copies at any business office of the defendant with the person having charge thereof.

10. This Court has personal jurisdiction over Defendant.

11. Venue is proper with this Court pursuant to RSMo. § 508.010 and RSMo. § 213.111.

### **Exhaustion of Administrative Remedies**

12. On or about **November 20, 2023**, Plaintiff filed a timely charge of disability discrimination and retaliation against Defendant dually with the Missouri Commission on Human Rights (“MCHR”) and the Equal Employment Opportunity Commission (“EEOC”). The Charge of Discrimination is attached hereto and incorporated by reference as though fully set forth herein as **Exhibit A**.

13. On or about **May 3, 2024**, Plaintiff filed a timely amended charge of discrimination and retaliation against Defendant dually with the Missouri Commission on Human Rights (“MCHR”) and the Equal Employment Opportunity Commission (“EEOC”). The Charge of Discrimination is attached hereto and incorporated by reference as though fully set forth herein as **Exhibit B**.

14. On or about **February 11, 2025**, Plaintiff was issued her Right to Sue from the Missouri Commission on Human Rights (“MCHR”). The Right to Sue is attached hereto and incorporated by reference as though fully set forth herein as **Exhibit C**.

15. This lawsuit was filed within two (2) years of Defendant’s unlawful conduct.

16. Plaintiff has met all deadlines and has satisfied all procedural, administrative, and judicial prerequisites to filing suit.

### **General Factual Allegations**

17. Plaintiff is a disabled female.

18. Plaintiff began working for Defendant as a Licensed Mental Health Professional in December of 2021.

19. Plaintiff remained employed in this position until her unlawful constructive discharge on January 5, 2024. While employed with Defendant, Plaintiff worked under the

Program Director, [REDACTED], Assistant Director, [REDACTED], Team Leader [REDACTED]  
[REDACTED], and Team Leader, [REDACTED].

### **FALSE CLAIMS ACT RETALIATION**

20. In February 2023, one of Plaintiff's supervisors, directed Plaintiff to "back-date" and bill Medicaid for some of Plaintiff's therapy services for a client who is named "Client 1" for HIPAA purposes.

21. Under Defendant's program, a client is allowed a certain amount of "free" therapy services.

22. Client 1 had been seeing Plaintiff for approximately four (4) months.

23. Plaintiff knew that back-dating services to charge for the entirety of those services was fraud against the government and refused to participate.

24. Plaintiff informed three supervisors of the same.

25. Later that month, on February 16, 2023, there was an all-staff meeting that was sold to staff as a "safe" and "open" department meeting where they could air their grievances in order to move forward in our department's goals and vision.

26. The leadership told Plaintiff and the rest of the staff that no one in management would intervene while issues were being discussed.

27. However, as Plaintiff was talking, Plaintiff's second-line supervisor interrupted her and began harassing her in front of the entire staff.

28. Plaintiff asked her to stop, and Ms. [REDACTED] refused.

29. Plaintiff was humiliated she began tearing up; she excused herself to use the restroom and compose herself.

30. Plaintiff returned to the meeting; her second line supervisor said, with pointed sarcasm: I'm sorry your feelings were hurt."

31. Plaintiff requested a meeting with management in order to discuss her individual concerns about her second line supervisor.

32. In this meeting, management conceded that Plaintiff's second line supervisor had acted inappropriately and aggressively.

33. On March 2, 2023, Plaintiff again reported to Defendant's management that she was being asked to commit Medicaid fraud by her second-line supervisor and that her second-line supervisor was retaliating against her for refusing.

34. Plaintiff also reported a previous incident where Plaintiff's second-line supervisor directed her to allow a student intern to "chart" under her name and credentials, which Plaintiff also knew to be illegal.

35. On March 27, 2023, Plaintiff approached Defendant's management about her reports of fraud and retaliation.

36. Instead of answering her questions, Defendant's management officer responded by initiation an unwarranted critique Plaintiff's job performance.

37. Plaintiff informed management that she had come to talk about the fraud and the retaliation, and that she was not expecting criticism of her work.

38. Defendant possessed policies and practices that would apply to an authentic performance review that were not followed.

39. Plaintiff's job performance was more than adequate.

40. That same month, in March 2023, Plaintiff hot-lined the Medicaid fraud information to the Defendant's manager designed by policy to receive fraud reports.



41. Plaintiff never received a response or any follow-up from this report.

42. In April 2023, Defendant's management held a meeting with Plaintiff's team without Plaintiff's second line supervisor.

43. At this meeting, Plaintiff witnessed many concerning reports of sexual harassment, harassment/bullying, inappropriate statements, inappropriate touch, and lack of boundaries or professionalism against her second-line supervisor.

44. Defendant's management official blew these complaints off and said: "Oh she reminds me so much of me when I was young," and later that month expressed her approval of the second line supervisor and took the second-line supervisor on a vacation.

#### **DISABILITY DISCRIMINATION AND RETALIATION**

45. Plaintiff was professionally diagnosed with long-covid in September 2022, but she had experienced symptoms since January 2022, when she first contracted COVID-19.

46. The condition had caused Plaintiff to have difficulty breathing, particularly in warm environments, and in the sun; the breathing issue was significant enough that it would prevent her from walking long distances.

47. Plaintiff's breathing issue did not interfere with her ability to fulfill her job duties, and she was able to perform all of her essential functions at a high level.

48. But then one day, Defendant's management decided to hold a team retreat outside at Loose Park in July of 2023

49. When Plaintiff received the invitation to Loose Park in May 2023, she immediately informed her supervisor that due to her medical diagnosis, she could not attend.

50. The supervisor told Plaintiff she was not excused and that "there is shade."

51. On June 30, 2023, Plaintiff reached out to Human Resources because she feared she would face retaliation for reporting her disability and not attending the July 2023 outside event.

52. Defendant's Human Resources asked Plaintiff to fill out an accommodation form, which she did.

53. Plaintiff did not hear back from my accommodation request before the outdoor meeting occurred.

54. Plaintiff missed the outside retreat due to her health concerns.

55. On July 28, 2023, Plaintiff received a call from [REDACTED] in Occupational Health who informed Plaintiff that her request was only conditionally approved until she could provide a 30-day, daily log of when she was asked to work outside in 80 and over degree weather for more than 90 minutes.

56. Plaintiff's request was amended and agreed upon by the Program Director for the following: "The accommodation needed was to attend the all-day outside staff retreat remotely on July 5 (sic), 2023, due to the hot temperatures outdoors. No further accommodation is needed at this time. Moving forward, if any accommodation is needed, we will request this on a situational basis."

57. In June 2023, Plaintiff received a performance evaluation from her supervisor that concluded she "met expectations," yet contained scathing, unfounded criticism of her work.

58. In Plaintiff's response to that review, she reported discrimination based on her disability; that her report of illegal activity was wholly ignored, never investigated, and disregarded.

59. Plaintiff's review stated:

Stacie has had moments throughout the year when her behaviors do not align with the Personal Conduct Policy and have required coaching from leadership.

Over the last year, behaviors such as abruptly leaving the room when in meetings, being defensive in meetings, avoidant behaviors, and refusing to attend meetings

"When Stacie communicates directly with leadership she has not always demonstrated appropriate professionalism exhibited by becoming tearful and/ or leaving the room. The lack of awareness of these behaviors has led to concerns for settings outside of department meetings. Many of these instances have happened in front of RC's, and community partners. Additionally, there have been concerns about expressing situations and experiences to her peers

60. Plaintiff also reported comments from other therapists such as “people are gay because of the hormones they put in cows”, “some kids just need a good beating to understand what they need to do”, and “being trans is just a fad.”

61. Because of the retaliatory performance review, Plaintiff asked for a meeting to discuss her concerns.

62. On August 4, 2023, a meeting was held with Plaintiff, and two members of management.

63. Ms. [REDACTED] insultingly told Plaintiff that she “had to pray” before their meeting, indicating she was nervous about her meeting with Plaintiff.

64. At the end of the meeting, Ms. [REDACTED] requested that Plaintiff let her co-workers know they had a conversation; because “whether you like it or not, your peers see you as a leader” and “they will follow you.”

65. On November 8, 2023, Plaintiff was written up for using an “inappropriate tone ” when she confessed feeling demoralized by the lack of resources to help patients, even though they had reported on surveys many times the need for more resources..

66. Following this passing comment, Defendant initiated an investigation against Plaintiff and pressured her coworkers to write statements about her comment .

67. This “investigation” was a sham because it did not warrant any investigation, did not follow any policy, sought to intimidate witnesses and discourage reporting from other employees.

68. On January 5, 2024 Plaintiff could no longer bear the intolerable working conditions caused by her supervisor’s obvious intent to force her to quit in retaliation for refusing to commit fraud, reporting the fraud, pushing back against the Defendant’s decision to target her disability, and finally her supervisor’s decision to concoct a a story to justify a sham investigation intent only to isolate her from her coworkers and undermine her ability to take care of patients; at that point, Defendant constructively discharged her.

**COUNT I**  
**Disability Discrimination Based Including a Hostile Work Environment in Violation of the Missouri Human Rights Act**

69. Plaintiff incorporates all paragraphs and allegations of this Petition as if set forth herein.

70. Plaintiff was qualified to perform her job.

71. Plaintiff has a physical impairment which substantially limits one or more of her major life activities.

72. Plaintiff is regarded as having such an impairment and has a record of having such an impairment.

73. Plaintiff, with or without reasonable accommodation, could perform her job.

74. Defendant’ did not make an attempt to reasonably accommodate Plaintiff, violating the MHRA.

75. Plaintiff’s disability was a motivating factor in Defendant’s negative treatment of Plaintiff.

76. Plaintiff's disability actually played a role in and had a determinative influence on the discrimination, including her termination.

77. Plaintiff previously experienced, and reported, disability discrimination during her employment tenure with Defendant.

78. Management was aware of this discrimination, saw it and/or participated in it, but did nothing to eradicate it.

79. The discrimination perpetrated against Plaintiff affected a term, condition, or privilege of Plaintiff's employment and/or was sufficiently severe or pervasive to alter or affect the conditions of Plaintiff's employment.

80. Defendant failed to take appropriate and prompt remedial action in response to incidents of and complaints of disability discrimination and harassment.

81. As a direct and proximate result of Defendant's discriminatory actions, Plaintiff sustained damages in the form of lost wages, loss of earning capacity, loss of career opportunity, pain and suffering, loss of enjoyment of life, humiliation, emotional distress, and damage to her reputation in an amount yet to be determined.

82. Plaintiff respectfully requests that this Court enter judgment against Defendant for actual damages, special damages, attorneys' fees recoverable by statute, costs, and all such further relief the Court deems just and equitable. Plaintiffs reserve the right to assert a claim for punitive damages based on the outrageous, malicious, and reckless conduct alleged, as permitted by RSMo. § 510.261.

83. As a direct and proximate result of Defendant's discriminatory actions, Plaintiff sustained damages in the following respects including, but not limited to, lost wages, loss of

earning capacity, loss of career opportunity, pain and suffering, loss of enjoyment of life, humiliation, emotional distress, and damage to her reputation in an amount yet to be determined.

84. Plaintiff respectfully requests that this Court enter judgment against Defendant for actual damages, compensatory damages, punitive damages, and attorneys' fees recoverable by statute, costs, and all such further relief the Court deems just and equitable.

85. Defendant's conduct was outrageous because of Defendant's evil motive or reckless indifference to the rights of Plaintiff, thereby entitling Plaintiff to punitive damages in an amount that will punish Defendant and deter Defendant and others from like conduct.

86. Any cap or limitation on Plaintiff's damages that may be imposed by RSMO § 213.111.4 (2017) is unconstitutional in that it violates Plaintiff's right to trial by jury, MO. CONST. art. I, § 22(a); separation of powers, MO. CONST. art. II, § 1; the right to equal protection, MO. CONST. art. I, § 2; the prohibition on special legislation, MO. CONST. art. III, § 40; and the right to due process. MO. CONST. art. I, § 10.

87. Any cap or limitation on punitive damages is unconstitutional in that it violates Plaintiff's right to trial by jury, MO. CONST. art. I, § 22(a); separation of powers, MO. CONST. art. II, § 1; the right to equal protection, MO. CONST. art. I, § 2; the prohibition on special legislation, MO. CONST. art. III, § 40; and the right to due process. MO. CONST. art. I, § 10.

WHEREFORE Plaintiff requests that this Court enter judgment in Plaintiff's favor and against Defendant, finding that Plaintiff is the prevailing party, awarding Plaintiff damages as proven at trial, including front pay, back pay, and other actual damages, attorneys' fees and related litigation and enforcement costs and expenses, punitive damages and granting Plaintiff such other and further relief as the Court deems just and proper.

**Count II**  
**Retaliation Under the False Claims Act, 31 U.S.C. § 3730(h)**

88. Plaintiff incorporates by reference all paragraphs and allegations in this Petition as though fully set forth herein.

89. Plaintiff engaged in protected activity by reporting and lawfully trying to stop one or more violations of Medicaid Fraud, including unlawful billing by Defendants to Medicaid for services that were not covered, which violated the False Claims Act.

90. Whether or not any actual Medicaid Fraud, violation occurred, Plaintiff reasonably and in good faith believed that the conduct described above constituted unlawful billing practices in violation of the Medicaid Fraud. She reported and responded to the apparent violations accordingly, including by going outside her normal chain of command to make specific warnings of violations of the False Claims Act.

91. As alleged above, Defendants knew of Plaintiff's protected activity, including her continuous efforts to stop what appeared to be—and what she reasonably and in good faith believed to be—ongoing violations of the Medicaid Fraud.

92. As alleged above, Defendants retaliated against Plaintiff because of her protected activity in trying to stop ongoing violations of the Medicaid Fraud, by subjecting her to a hostile work environment and taking a series of escalating and unwarranted adverse employment actions against her, including unwarranted investigations and eventual constructive discharge—all with pretextual justification or without any justification at all.

93. As a direct result of Defendants' retaliatory conduct, Plaintiff has sustained compensatory and noncompensatory damages, including without limitation lost pay and benefits and emotional distress.

**COUNT III**  
**Retaliation in Violation of the Missouri Human Rights Act**

94. Plaintiff incorporates all paragraphs and allegations of this Petition as if set forth herein.

95. During her employment, Plaintiff complained to Defendant, objected to and/or opposed the harassment and/or discrimination by, among other things, complaining of discrimination.

96. Plaintiff's complaints to Defendant about discrimination are protected activities under the MHRA.

97. Plaintiff's complaints of discrimination motivated Defendant's actions, inactions, decisions, and/or conduct that affected the terms, conditions, and privileges of Plaintiff's employment as alleged herein.

98. Defendant's actions and/or inactions constitute unlawful retaliation against Plaintiff in violation of the MHRA.

99. Defendant retaliated against Plaintiff by subjecting her to different forms of harassment and terminating her employment.

100. Plaintiff suffered adverse action in the form of retaliatory harassment and eventual termination of her employment as a result of her protected activity.

101. Defendant took no remedial action in response to Plaintiff's complaints.

102. Defendant's retaliation toward Plaintiff was because Plaintiff reported and opposed the discrimination.

103. Defendant's conduct constitutes retaliation against Plaintiff in reckless disregard of Plaintiff's known rights.



104. Defendant's actions as set forth above constitute a pattern and practice of retaliation in violation of the MHRA.

105. Defendant's actions and/or inactions occurred by and/or through its agents, servants, and/or employees acting within the course and scope of their employment.

106. As a direct and proximate result of Defendant's discriminatory actions, Plaintiff sustained damages in the following respects including, but not limited to, lost wages, loss of earning capacity, loss of career opportunity, pain and suffering, loss of enjoyment of life, humiliation, emotional distress, and damage to her reputation in an amount yet to be determined.

107. Plaintiff respectfully requests that this Court enter judgment against Defendant for actual damages, compensatory damages, punitive damages, and attorneys' fees recoverable by statute, costs, and all such further relief the Court deems just and equitable.

108. Plaintiff was damaged by the discrimination and harassment and is entitled to all remedies available to her as provided in the Missouri Human Rights Act, including but not limited to damages for loss of income, embarrassment, humiliation, emotional distress, damage to her reputation, diminution in earnings capacity, and other damages as yet undetermined, and Plaintiff is reasonably expected to suffer from such damages in the future.

109. Defendant's conduct was outrageous because of Defendant's evil motive or reckless indifference to the rights of Plaintiff, thereby entitling Plaintiff to punitive damages in an amount that will punish Defendant and deter Defendant and others from like conduct.

110. Any cap or limitation on Plaintiff's damages that may be imposed by RSMO § 213.111.4 (2017) is unconstitutional in that it violates Plaintiff's right to trial by jury, Mo. Const. art. I, § 22(a); separation of powers, Mo. Const, art. II, § 1; the right to equal protection, Mo. Const,

art. I, § 2; the prohibition on special legislation, Mo. Const, art. III, § 40; and the right to due process. Mo. Const. art. I. § 10.

111. Any cap or limitation on punitive damages is unconstitutional in that it violates Plaintiff's right to trial by jury, Mo. Const. art. I, § 22(a); separation of powers, Mo. Const, art. II, § 1; the right to equal protection, Mo. Const, art. I, § 2; the prohibition on special legislation, Mo. Const, art. III, § 40; and the right to due process. Mo. Const. art. I. § 10.

WHEREFORE, Plaintiff requests that this Court enter judgment in Plaintiff's favor and against Defendant, finding that Plaintiff is the prevailing party, awarding Plaintiff damages as proven at trial, including front pay, back pay, and other actual damages, attorneys' fees and related litigation and enforcement expenses, punitive damages and granting Plaintiff such other and further relief as the Court deems just and proper.

#### **COUNT IV**

##### **Violation of the Missouri's Whistleblower Protection Act, RSMo Chapter 285.575**

112. Plaintiff incorporates all paragraphs and allegations of this Petition as if set forth herein.

113. At all times [REDACTED] and [REDACTED] were employees and agents of Defendants and were acting within the scope of their employer and/or agency, and Defendants are responsible for the action of [REDACTED] and [REDACTED].

114. Plaintiff is a protected person within the meaning of RSMo § 285.575, in that Plaintiff reported activity to [REDACTED] and [REDACTED], which she believed was violation of state and/or federal law.

115. Plaintiff's protected classification actually played a role in her discharge from employment with Defendant and had a determinative influence on her discharge from employment with Defendant.

116. As a direct and proximate result, Plaintiff has suffered actual damages in the form of lost back wages, consisting of lost salary, lost benefits and lost pension benefits.

117. In addition, Plaintiff is entitled to recover her costs and attorneys' fees pursuant to RSMo. § 285.575.8.

**COUNT V**  
**Liquidated Damages**

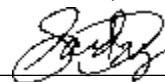
118. The conduct of Defendant, through its agents Hoard and Sturdivant were outrageous because of Defendant's evil motive and reckless indifference to the rights of Plaintiff and others.

119. Plaintiff is entitled to double damages awarded with regards to back pay, including lost salary, lost benefits, and lost pension benefits.

120. In addition, Plaintiff is entitled to recover her costs and attorneys' fees pursuant to RSMo. § 285.575.8.

WHEREFORE, Plaintiff requests that this Court enter judgment in Plaintiff's favor and against Defendant, finding that Plaintiff is the prevailing party, awarding Plaintiff damages as proven at trial, including front pay, back pay, and other actual damages, attorneys' fees and related litigation and enforcement expenses, punitive damages and granting Plaintiff such other and further relief as just and proper.

BROWN, CURRY & DUGGAN, LLC



Sarah J. Duggan #73687

Dan Curry #58264

1600 Genessee STE 956

Kansas City, Missouri 64101  
Ph: 816-756-5458  
sduggan@brownandcurry.com  
dan@brownandcurry.com

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

STACIE MCCALL,

Plaintiff,

v.

TRUMAN MEDICAL CENTER, INC. D/B/A )  
UNIVERSITY HEALTH - BEHAVIORAL )  
HEALTH SERVICES )

Case No: \_\_\_\_\_

Division: \_\_\_\_\_


Defendant.

**DESIGNATION OF LEAD ATTORNEY OF RECORD**

Pursuant to Local Rules 3.5.1 and 3.5.2, Sarah Duggan of the law firm of Brown, Curry & Duggan, LLC hereby gives notice to the Court, the parties, and all counsel of record that he will serve as lead counsel on behalf of Plaintiff in the above-captioned case. Contact information is as follows.

Sarah Duggan, Brown, Curry & Duggan, LLC  
1600 Genessee, Ste 956  
Kansas City, MO 64102  
T: (816)756-5458  
F: (816)666-9596  
sduggan@brownandcurry.com

Respectfully submitted,



Sarah J. Duggan #73687  
1600 Genessee St., Ste. 956  
Kansas City, MO 64102  
Tele: (816) 756-5458  
Fax: (816) 666-9596  
sduggan@brownandcurry.com

ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2025, the foregoing document was electronically filed with the Clerk of the Court using the electronic filing system which automatically transmits a Notice of Electronic Filing to all counsel of record.

/s/ Sarah J. Duggan

ATTORNEY FOR PLAINTIFFS



  
\_\_\_\_\_  
Sarah J. Duggan #73687  
1600 Genessee St., Ste. 956  
Kansas City, MO 64102  
Tele: (816) 756-5458  
Fax: (816) 666-9596  
sduggan@brownandcurry.com

ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on February 17, 2025, the foregoing document was electronically filed with the Clerk of the Court using the electronic filing system which automatically transmits a Notice of Electronic Filing to all counsel of record.

/s/ Sarah J. Duggan  
\_\_\_\_\_  
ATTORNEY FOR PLAINTIFFS



**IN THE CIRCUIT COURT OF JACKSON COUNTY  
AT KANSAS CITY, MISSOURI**

Stacie McCall )  
Plaintiff/Petitioner, )  
VS. )  
Truman Medical Center, Inc. d/b/a )  
University Health – Behavioral )  
Health Services )  
Defendant/Respondent. )

Case No.: \_\_\_\_\_

Division No.: \_\_\_\_\_

**MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

COMES NOW Plaintiff/Petitioner, by and through counsel, and pursuant to Local Rule 4.9 of Jackson County Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

William	Acree	PPS25-0134
Paul	Aizel	PPS25-0135
Mark	Allen	PPS25-0136
Sandra	Allen	PPS25-0137
Tracy	Arnold	PPS25-0138
Jeffrey	Aronson	PPS25-0321
Brian	Bankowski	PPS25-0139
Tarah	Beaulieu	PPS25-0140
Richard	Benito	PPS25-0141
Brenda	Benoit	PPS25-0142
Allison	Bernardo	PPS25-0143
Daniela	Bert	PPS25-0144
Matthew	Bert	PPS25-0145
David	Biddle	PPS25-0146
Nicholas	Bill	PPS25-0147
Bryan	Blair	PPS25-0148

Keith	Blanchard	PPS25-0149
Eddie	Bland	PPS25-0150
Diana	Blea	PPS25-0151
Richard	Blea	PPS25-0152
Thomas	Bogue	PPS25-0153
Raymond	Brandy	PPS25-0154
Kathy	Broom	PPS25-0155
Gary	Burt	PPS25-0156
Adam	Burton	PPS25-0157
Veronica	Calderon	PPS25-0158
Karen	Calkins	PPS25-0159
Bobby	Calvert	PPS25-0160
Anna	Canole	PPS25-0161
Justin	Carlson	PPS25-0162
Charles	Casey	PPS25-0163
Gina	Cash	PPS25-0164
George	Castillo	PPS25-0165

Lori	Cole	PPS25-0166
Krehl	Coleman	PPS25-0167
Susan	Collins	PPS25-0168
Chad	Compton	PPS25-0169
James	Cox	PPS25-0018
James R.	Cox	PPS25-0170
Kimberley	Cox	PPS25-0171
Dennis	Dahlberg	PPS25-0021
Maria	Darling	PPS25-0172
Bryce	Dearborn	PPS25-0173
Robert	DeLacy III	PPS25-0174
Robert	DeLacy Jr	PPS25-0175
Dominic	DellaPorte	PPS25-0176
Cheryl	Dofelmire	PPS25-0177
Claudia	Dohn	PPS25-0178
Amy	Donarski	PPS25-0179
Aaron	Donarski Sr.	PPS25-0180
Dale	Dorning	PPS25-0181
Catherine	Drake	PPS25-0182
John	Dressler	PPS25-0183
Rebecca	Dressler	PPS25-0184
Terrence	Drew	PPS25-0185
Michael	Dunard	PPS25-0186
Josh	Dunn	PPS25-0187
Randy	Earl	PPS25-0188

Courtney	Edwards	PPS25-0189
Christopher	Eixenberger	PPS25-0190
Sheri	Eixenberger	PPS25-0191
Abel	Emiru	PPS25-0192
Donald	Eskra Jr.	PPS25-0193
Cindy	Ethridge	PPS25-0031
Larry	Evans	PPS25-0194
Robert	Fairbanks	PPS25-0195
Ryan	Fortune	PPS25-0196
Melissa	Fritz	PPS25-0197
Richard	Gerber	PPS25-0198
Adam	Golden	PPS25-0199
Bradley	Gordon	PPS25-0200
Kimberly	Greenway	PPS25-0201
Dawn	Griffin-Luce	PPS25-0202
Paul	Grimes	PPS25-0203
Charles	Gunndug	PPS25-0204
Mark	Hagood	PPS25-0205
James	Harvey Jr.	PPS25-0206
Grace	Hazell	PPS25-0207
Stephen	Heitz	PPS25-0208
Austen	Hendrickson	PPS25-0209
Elizabeth	Henson	PPS25-0210
Michael	Hibler	PPS25-0211
Trinity	Hibler	PPS25-0212

Averi	Holman	PPS25-0213
Jenna	Holt	PPS25-0214
Parry	Howell	PPS25-0215
Martin	Hueckel	PPS25-0216
Michael D	Huffman	PPS25-0217
Pamela S	Huffman	PPS25-0218
Anthony	Ivarone	PPS25-0219
George	Illidge	PPS25-0220
Frank	James	PPS25-0221
Matthew	Jankowski	PPS25-0222
Zachary	Jenkins	PPS25-0223
Betty	Johnson	PPS25-0224
Kevin	Johnson	PPS25-0225
Ron	Johnson	PPS25-0226
Patrick	Jones	PPS25-0227
Kenneth	Kearney	PPS25-0228
Kenneth	Klewicki	PPS25-0229
Janice	Kirkhart	PPS25-0056
Tyler	Kirkhart	PPS25-0057
Brent	Kirkhart	PPS25-0058
Anthony	Ko	PPS25-0230
Michele	Kriner	PPS25-0231
Casey	Lanford	PPS25-0232
Marcus	Lawing	PPS25-0233
Jennifer	Lecuyer	PPS25-0318

John	Lichtenegger	PPS25-0234
Bryan	Liebhart	PPS25-0235
Bert	Lott	PPS25-0236
Robert	Maliuuk	PPS25-0237
Winnonna	Maliuuk	PPS25-0238
Bonnie	Marvin	PPS25-0239
Michael	McMahon	PPS25-0240
Michael	Meador	PPS25-0241
James	Meadows	PPS25-0242
Krista	Meadows	PPS25-0243
Jerry	Melber	PPS25-0244
Carrie	Melte	PPS25-0245
Eric	Mendenhall	PPS25-0246
Matthew	Millhollin	PPS25-0247
Carla	Monegain	PPS25-0248
Spencer	Mongtomery	PPS25-0249
Christopher	Moore	PPS25-0250
Daniel	Moore	PPS25-0251
Michael	Morrison	PPS25-0252
Nancy	Muchnick	PPS25-0253
Kelly	Murski	PPS25-0254
Paul	Nardizzi	PPS25-0255
Lance	Neff	PPS25-0256
Wendy	Neff	PPS25-0257
Jeremy	Nicholas	PPS25-0079

Aubrianna	Nichols	PPS25-0258
Diana	Nichols	PPS25-0259
Jeffrey	Nichols	PPS25-0260
Carla	Niekamp	PPS25-0359
Michael	Noble	PPS25-0261
Michael J.	Noble	PPS25-0080
Daryl	Oestreich	PPS25-0262
Daniel	Owens	PPS25-0263
Craig	Palmer	PPS25-0264
Cynthia	Paris	PPS25-0265
M. Frederick	Parson	PPS25-0266
Cody	Patton	PPS25-0267
Vincent	Piazza	PPS25-0268
Timothy	Pinney	PPS25-0269
Nancy	Porter	PPS25-0270
Mason	Potter	PPS25-0271
Benjamin	Purser	PPS25-0272
Jason	Ramey	PPS25-0319
Jadyn	Ramey	PPS25-0320
Richard	Ramirez	PPS25-0273
Christopher	Reed	PPS25-0274
Gavin	Rees	PPS25-0275
Lisa	Rees	PPS25-0276
Cheryl	Richey	PPS25-0277
Chase	Ridgeway	PPS25-0278

Richard	Rober	PPS25-0279
David	Roberts	PPS25-0280
Patricia	Roberts	PPS25-0281
Richard	Ross Jr.	PPS25-0282
Steve	Rozhon	PPS25-0283
Rene Ann	Rulo	PPS25-0284
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Vincent	Sarelli	PPS25-0286
Tristan	Seaver	PPS25-0287
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Terri Lynn	Shean-Gilam	PPS25-0289
Katie	Shiflett	PPS25-0290
Kenneth	Short	PPS25-0291
Jordan	Sitarski	PPS25-0292
Thomas	Skinner	PPS25-0293
Bryan	Smith	PPS25-0294
Brian	Smith	PPS25-0295
Garrett	Smith	PPS25-0296
Gean	Smith	PPS25-0297
Katie Jo	Smith	PPS25-0298
Anthony	Spada	PPS25-0299
Melissa	Spencer-Bryant	PPS25-0300
Samuel	Staton	PPS25-0301
Shelby	Stauble	PPS25-0302
Jason	Stoor	PPS25-0303

Steven	Stosur	PPS25-0304
Ramona	Talvacchio	PPS25-0305
Jeffrey	Teitel	PPS25-0306
John	Thompson	PPS25-0307
John	Udy	PPS25-0308
Robert E.	Vick II	PPS25-0116
Brad	Votaw	PPS25-0117
Zachary	Wakid	PPS25-0309
Ambiko	Wallace	PPS25-0310
Stephen	Waters	PPS25-0119
Michael	Weaver	PPS25-0311

Ryan E.	Weekley	PPS25-0120
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Ryan M.	Weekley	PPS25-0122
Barbara	West	PPS25-0312
Crystal	Williams	PPS25-0313
Jack L.	Williams	PPS25-0314
Gregory	Willing	PPS25-0315
Conni	Wilson	PPS25-0128
Edwin	Young	PPS25-0316
Nick	Zotti	PPS25-0317

as private process servers in the above-captioned matter. In support of said motion, Plaintiff/Petitioner states that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Respectfully Submitted,

Sarah J. Duggan #73687  
 1600 Genessee St., Ste. 956  
 Kansas City, MO 64102  
 Tele: (816) 756-5458  
 Fax: (816) 666-9596  
 sduggan@brownandcurry.com  
 Attorney for Plaintiff

**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Petitioner/Plaintiff's Motion for Appointment of Private Process Server is sustained and that HPS Process Service & Investigations and the above named individuals are hereby appointed to serve process in the above captioned matter.

DATE: \_\_\_\_\_

\_\_\_\_\_  
 Judge or Circuit Clerk

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY**

**STACIE MCCALL,**

**PLAINTIFF(S),  
VS.**

**CASE NO. 2516-CV04651  
DIVISION 4**

**TRUMAN MEDICAL CENTER, INC.,**

**DEFENDANT(S).**

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE  
AND ORDER FOR MEDIATION**

---

NOTICE IS HEREBY GIVEN that this case is currently assigned to the Honorable PATRICK CHARLES EDWARDS and a Case Management Conference will be held with the Honorable PATRICK CHARLES EDWARDS on **09-JUN-2025** in **DIVISION 4** at **09:00 AM**, pursuant to Administrative Order. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16<sup>th</sup> Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16<sup>th</sup> Judicial Circuit web site at [www.16thcircuit.org](http://www.16thcircuit.org) after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

### **MEDIATION**

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

### **POLICIES/PROCEDURES**

Please refer to the Court's web page [www.16thcircuit.org](http://www.16thcircuit.org) for division policies and procedural information listed by each judge.

**/S/ PATRICK CHARLES EDWARDS**  
**PATRICK CHARLES EDWARDS, Circuit Judge**

### **Certificate of Service**

This is to certify that a copy of the foregoing was mailed postage pre-paid or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

**Attorney for Plaintiff(s):**

SARAH JESSICA DUGGAN, 312 W, KANSAS CITY, MO 64112

**Defendant(s):**

TRUMAN MEDICAL CENTER, INC.

Dated: 20-FEB-2025

BEVERLY A. NEWMAN  
Court Administrator

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☒ AT KANSAS CITY ☐ AT INDEPENDENCE

RE: STACIE MCCALL V TRUMAN MEDICAL CENTER, INC.  
CASE NO: 2516-CV04651

TO: SARAH JESSICA DUGGAN  
312 W  
KANSAS CITY, MO 64112

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on 02/17/25. However, your pleading cannot be processed further until the following action is taken:

**RULE 3.2 - STYLE**

- ☐ Additional service instructions are needed.
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

**RULE 4.2 (2)**

- ☐ Need Circuit Court Form 4

**RULE 5.6 – COLLECTIONS OF DEPOSIT**

- ☐ No fee, or incorrect fee, received; fee required is \$\_\_\_\_\_.
- ☐ Insufficient Filing Fee; Please Remit \$\_\_\_\_\_
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

**RULE 68.1**

- ☐ Need Circuit Court Form 17

**RULE 68.7 – VITAL STATISTICS REPORT**

- ☐ Need Certificate of dissolution of marriage form.

**RULE 74.14 SUPREME CT – FOREIGN JUDGMENT**

- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

**RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS**

- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

☒ **OTHER:** Please refile your motion/proposed order for private process server as "MATTHEW BERT, JAMES R COX PPS25-0170, MICHAEL NOBLE PPS25-0261 and ANTHONY IVARONE" are not an approved process server for Jackson County. For reference please double check <https://www.16thcircuit.org/private-process-server-approval-list>. For questions please contact at 816-881-3970.

- ☐ Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.
- ☐ The private process server listed is not on our approved list.
- ☐ Execution in effect. Return date \_\_\_\_\_. Request may be resubmitted within one week prior to return date.
- ☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

**If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.**

Please refer to the Court's website at [www.16thcircuit.org](http://www.16thcircuit.org) for Court Rules or Forms.

Copies electronic noticed, faxed, emailed and/or mailed FEBRUARY 20, 2025 to:

COURT ADMINISTRATOR'S OFFICE  
DEPARTMENT OF CIVIL RECORDS  
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

FEBRUARY 20, 2025

Date

By

Deputy Court Administrator

- ☒ 415 East 12<sup>th</sup> St., Kansas City, Missouri 64106
- ☐ 308 W. Kansas, Independence, Missouri 64050



**IN THE CIRCUIT COURT OF JACKSON COUNTY  
AT KANSAS CITY, MISSOURI**

Stacie McCall

\_\_\_\_\_) )  
Plaintiff/Petitioner, )  
VS. )  
\_\_\_\_\_) )  
Truman Medical Center, Inc. )  
Defendant/Respondent. )

Case No.:2516-CV04651

Division No.: 4

**MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

COMES NOW Plaintiff/Petitioner, by and through counsel, and pursuant to Local Rule 4.9 of Jackson County Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

William	Acree	PPS25-0134
Paul	Aizel	PPS25-0135
Mark	Allen	PPS25-0136
Sandra	Allen	PPS25-0137
Tracy	Arnold	PPS25-0138
Jeffrey	Aronson	PPS25-0321
Brian	Bankowski	PPS25-0139
Tarah	Beaulieu	PPS25-0140
Richard	Benito	PPS25-0141
Brenda	Benoit	PPS25-0142
Allison	Bernardo	PPS25-0143
Daniela	Bert	PPS25-0144
Mathew	Bert	PPS25-0145
David	Biddle	PPS25-0146
Nicholas	Bill	PPS25-0147
Bryan	Blair	PPS25-0148
Keith	Blanchard	PPS25-0149
Eddie	Bland	PPS25-0150

Diana	Blea	PPS25-0151
Richard	Blea	PPS25-0152
Thomas	Bogue	PPS25-0153
Raymond	Brandy	PPS25-0154
Kathy	Broom	PPS25-0155
James	Burke	PPS25-0379
Gary	Burt	PPS25-0156
Adam	Burton	PPS25-0157
Steve	Butcher	PPS25-0380
Veronica	Calderon	PPS25-0158
Karen	Calkins	PPS25-0159
Bobby	Calvert	PPS25-0160
Anna	Canole	PPS25-0161
Justin	Carlson	PPS25-0162
Charles	Casey	PPS25-0163
Gina	Cash	PPS25-0164
George	Castillo	PPS25-0165
Lori	Cole	PPS25-0166
Krehl	Coleman	PPS25-0167

Susan	Collins	PPS25-0168
Chad	Compton	PPS25-0169
James	Cox	PPS25-0018
Kimberley	Cox	PPS25-0171
Dennis	Dahlberg	PPS25-0021
Maria	Darling	PPS25-0172
Bryce	Dearborn	PPS25-0173
Robert	DeLacy III	PPS25-0174
Robert	DeLacy Jr	PPS25-0175
Dominic	DellaPorte	PPS25-0176
Cheryl	Dofelmire	PPS25-0177
Claudia	Dohn	PPS25-0178
Amy	Donarski	PPS25-0179
Aaron	Donarski Sr.	PPS25-0180
Dale	Dorning	PPS25-0181
Catherine	Drake	PPS25-0182
John	Dressler	PPS25-0183
Rebecca	Dressler	PPS25-0184
Terrence	Drew	PPS25-0185
Michael	Dunard	PPS25-0186
Josh	Dunn	PPS25-0187
Randy	Earl	PPS25-0188
Courtney	Edwards	PPS25-0189
Christopher	Eixenberger	PPS25-0190
Sheri	Eixenberger	PPS25-0191

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Ryan	Fortune	PPS25-0196
Melissa	Fritz	PPS25-0197
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Kurie	Ghersini	PPS25-0385
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Paul	Grimes	PPS25-0203
Charles	Gunndug	PPS25-0204
Mark	Hagood	PPS25-0205
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Elizabeth	Henson	PPS25-0210
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Conni	Wilson	PPS25-0128
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Nick	Zotti	PPS25-0317

as private process servers in the above-captioned matter. In support of said motion, Plaintiff/Petitioner states that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Respectfully Submitted,  
Sarah J. Duggan #73687  
1600 Genessee St., Ste. 956  
Kansas City, MO 64102  
Tele: (816) 756-5458  
Fax: (816) 666-9596  
sduggan@brownandcurry.com  
Attorney for Plaintiff

**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Petitioner/Plaintiff's Motion for Appointment of Private Process Server is sustained and that HPS Process Service & Investigations and the above named individuals are hereby appointed to serve process in the above captioned matter.

DATE: \_\_\_\_\_

\_\_\_\_\_  
Judge or Circuit Clerk

**IN THE CIRCUIT COURT OF JACKSON COUNTY  
AT KANSAS CITY, MISSOURI**

Stacie McCall

\_\_\_\_\_)  
Plaintiff/Petitioner, )  
VS. )  
\_\_\_\_\_)  
Truman Medical Center, Inc. )  
Defendant/Respondent. )

Case No.:2516-CV04651

Division No.: 4

**MOTION FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

COMES NOW Plaintiff/Petitioner, by and through counsel, and pursuant to Local Rule 4.9 of Jackson County Court Rules, hereby moves for the appointment of HPS Process Service & Investigations, Inc.:

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Tracy	Arnold	PPS25-0138
Jeffrey	Aronson	PPS25-0321
Brian	Bankowski	PPS25-0139
Tarah	Beaulieu	PPS25-0140
Richard	Benito	PPS25-0141
Brenda	Benoit	PPS25-0142
Allison	Bernardo	PPS25-0143
Daniela	Bert	PPS25-0144
Mathew	Bert	PPS25-0145
David	Biddle	PPS25-0146
Nicholas	Bill	PPS25-0147
Bryan	Blair	PPS25-0148
Keith	Blanchard	PPS25-0149
Eddie	Bland	PPS25-0150

Diana	Blea	PPS25-0151
Richard	Blea	PPS25-0152
Thomas	Bogue	PPS25-0153
Raymond	Brandy	PPS25-0154
Kathy	Broom	PPS25-0155
James	Burke	PPS25-0379
Gary	Burt	PPS25-0156
Adam	Burton	PPS25-0157
Steve	Butcher	PPS25-0380
Veronica	Calderon	PPS25-0158
Karen	Calkins	PPS25-0159
Bobby	Calvert	PPS25-0160
Anna	Canole	PPS25-0161
Justin	Carlson	PPS25-0162
Charles	Casey	PPS25-0163
Gina	Cash	PPS25-0164
George	Castillo	PPS25-0165
Lori	Cole	PPS25-0166
Krehl	Coleman	PPS25-0167

Susan	Collins	PPS25-0168
Chad	Compton	PPS25-0169
James	Cox	PPS25-0018
Kimberley	Cox	PPS25-0171
Dennis	Dahlberg	PPS25-0021
Maria	Darling	PPS25-0172
Bryce	Dearborn	PPS25-0173
Robert	DeLacy III	PPS25-0174
Robert	DeLacy Jr	PPS25-0175
Dominic	DellaPorte	PPS25-0176
Cheryl	Dofelmire	PPS25-0177
Claudia	Dohn	PPS25-0178
Amy	Donarski	PPS25-0179
Aaron	Donarski Sr.	PPS25-0180
Dale	Dorning	PPS25-0181
Catherine	Drake	PPS25-0182
John	Dressler	PPS25-0183
Rebecca	Dressler	PPS25-0184
Terrence	Drew	PPS25-0185
Michael	Dunard	PPS25-0186
Josh	Dunn	PPS25-0187
Randy	Earl	PPS25-0188
Courtney	Edwards	PPS25-0189
Christopher	Eixenberger	PPS25-0190
Sheri	Eixenberger	PPS25-0191

Abel	Emiru	PPS25-0192
Donald	Eskra Jr.	PPS25-0193
Cindy	Ethridge	PPS25-0031
Larry	Evans	PPS25-0194
Robert	Fairbanks	PPS25-0195
Ryan	Fortune	PPS25-0196
Melissa	Fritz	PPS25-0197
Richard	Gerber	PPS25-0198
Kurie	Ghersini	PPS25-0385
Adam	Golden	PPS25-0199
Bradley	Gordon	PPS25-0200
Kimberly	Greenway	PPS25-0201
Dawn	Griffin-Luce	PPS25-0202
Paul	Grimes	PPS25-0203
Charles	Gunndug	PPS25-0204
Mark	Hagood	PPS25-0205
John	Harder	PPS25-0387
Christy	Hartline	PPS25-0389
James	Harvey Jr.	PPS25-0206
Grace	Hazell	PPS25-0207
Stephen	Heitz	PPS25-0208
Austen	Hendrickson	PPS25-0209
Elizabeth	Henson	PPS25-0210
Michael	Hibler	PPS25-0211
Trinity	Hibler	PPS25-0212

Averi	Holman	PPS25-0213
Jenna	Holt	PPS25-0214
Parry	Howell	PPS25-0215
Martin	Hueckel	PPS25-0216
Michael D	Huffman	PPS25-0217
Pamela S	Huffman	PPS25-0218
Anthony	Iavarone	PPS25-0219
George	Illidge	PPS25-0220
Frank	James	PPS25-0221
Matthew	Jankowski	PPS25-0222
Zachary	Jenkins	PPS25-0223
Betty	Johnson	PPS25-0224
Kevin	Johnson	PPS25-0225
Ron	Johnson	PPS25-0226
Patrick	Jones	PPS25-0227
Kenneth	Kearney	PPS25-0228
Ken	Klewicki	PPS25-0229
Janice	Kirkhart	PPS25-0056
Tyler	Kirkhart	PPS25-0057
Brent	Kirkhart	PPS25-0058
Anthony	Ko	PPS25-0230
Michele	Kriner	PPS25-0231
Wyman	Kroft	PPS25-0412
Casey	Lanford	PPS25-0232
Marcus	Lawing	PPS25-0233

Jennifer	Lecuyer	PPS25-0318
John	Lichtenegger	PPS25-0234
Bryan	Liebhart	PPS25-0235
Bert	Lott	PPS25-0236
Robert	Maliuuk	PPS25-0237
Winnonna	Maliuuk	PPS25-0238
Bonnie	Marvin	PPS25-0239
Michael	McMahon	PPS25-0240
Michael	Meador	PPS25-0241
James	Meadows	PPS25-0242
Krista	Meadows	PPS25-0243
Jerry	Melber	PPS25-0244
Carrie	Melte	PPS25-0245
Eric	Mendenhall	PPS25-0246
Matthew	Millhollin	PPS25-0247
Carla	Monegain	PPS25-0248
Spencer	Montgomery	PPS25-0249
Christopher	Moore	PPS25-0250
Daniel	Moore	PPS25-0251
Michael	Morrison	PPS25-0252
Nancy	Muchnick	PPS25-0253
Kelly	Murski	PPS25-0254
Paul	Nardizzi	PPS25-0255
Lance	Neff	PPS25-0256
Wendy	Neff	PPS25-0257



Jeremy	Nicholas	PPS25-0079
Aubrianna	Nichols	PPS25-0258
Diana	Nichols	PPS25-0259
Jeffrey	Nichols	PPS25-0260
Carla	Niekamp	PPS25-0359
Michael	Noble	PPS25-0080
Daryl	Oestreich	PPS25-0262
Branson	Oxford	PPS25-0394
Daniel	Owens	PPS25-0263
Craig	Palmer	PPS25-0264
Cynthia	Paris	PPS25-0265
M. Frederick	Parsons	PPS25-0266
Cody	Patton	PPS25-0267
Vincent	Piazza	PPS25-0268
Timothy	Pinney	PPS25-0269
Nancy	Porter	PPS25-0270
Mason	Potter	PPS25-0271
Benjamin	Purser	PPS25-0272
Jason	Ramey	PPS25-0319
Jadyn	Ramey	PPS25-0320
Richard	Ramirez	PPS25-0273
Christopher	Reed	PPS25-0274
Gavin	Rees	PPS25-0275
Lisa	Rees	PPS25-0276
Cheryl	Richey	PPS25-0277

Chase	Ridgeway	PPS25-0278
Richard	Rober	PPS25-0279
David	Roberts	PPS25-0280
Patricia	Roberts	PPS25-0281
Richard	Ross Jr.	PPS25-0282
Steve	Rozhon	PPS25-0283
Rene Ann	Rulo	PPS25-0284
Robert	Sanders	PPS25-0285
Vincent	Sarelli	PPS25-0286
Tristan	Seaver	PPS25-0287
Westley	Seifert	PPS25-0288
Terri Lynn	Shean-Gilam	PPS25-0289
Katie	Shiflett	PPS25-0290
Kenneth	Short	PPS25-0291
Jordan	Sitarski	PPS25-0292
Thomas	Skinner	PPS25-0293
Bryan	Smith	PPS25-0294
Brian	Smith	PPS25-0295
Garrett	Smith	PPS25-0296
Gean	Smith	PPS25-0297
Katie Jo	Smith	PPS25-0298
Anthony	Spada	PPS25-0299
Melissa	Spencer-Bryant	PPS25-0300
Samuel	Staton	PPS25-0301
Shelby	Stauble	PPS25-0302

Frances	Stewart	PPS25-0399
Jason	Stoor	PPS25-0303
Steven	Stosur	PPS25-0304
Joshua	Swanson	PPS25-0401
Cody	Swartz	PPS25-0402
Ravon	Swindell	PPS25-0403
Ramona	Talvacchio	PPS25-0305
Jeffrey	Teitel	PPS25-0306
John	Thompson	PPS25-0307
John	Udy	PPS25-0308
Robert	Vick II	PPS25-0116
Brad	Votaw	PPS25-0117
Zachary	Wakid	PPS25-0309
Ambiko	Wallace	PPS25-0310

Stephen	Waters	PPS25-0119
Michael	Weaver	PPS25-0311
Ryan E.	Weekley	PPS25-0120
Austin	Weekley	PPS25-0121
Ryan M.	Weekley	PPS25-0122
Barbara	West	PPS25-0312
Crystal	Williams	PPS25-0313
Jack L.	Williams	PPS25-0314
Gregory	Willing	PPS25-0315
Conni	Wilson	PPS25-0128
Edwin	Young	PPS25-0316
Nick	Zotti	PPS25-0317

as private process servers in the above-captioned matter. In support of said motion, Plaintiff/Petitioner states that the above-named individuals are on the Court's list of approved process servers and the information contained in their applications and affidavits on file is current and still correct.

Respectfully Submitted,  
Sarah J. Duggan #73687  
1600 Genessee St., Ste. 956  
Kansas City, MO 64102  
Tele: (816) 756-5458  
Fax: (816) 666-9596  
sduggan@brownandcurry.com  
Attorney for Plaintiff

**ORDER FOR APPOINTMENT OF PRIVATE PROCESS SERVER**

It is hereby ordered that Petitioner/Plaintiff's Motion for Appointment of Private Process Server is sustained and that HPS Process Service & Investigations and the above named individuals are hereby appointed to serve process in the above captioned matter.

02/25/2025

DEPUTY COURT ADMINISTRATOR

*Jennifer Brookshin*



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI


Judge or Division: PATRICK CHARLES EDWARDS	Case Number: 2516-CV04651
Plaintiff/Petitioner: STACIE MCCALL	Plaintiff's/Petitioner's Attorney/Address SARAH JESSICA DUGGAN 312 W KANSAS CITY, MO 64112
Defendant/Respondent: TRUMAN MEDICAL CENTER, INC. DBA: UNIVERSITY HEALTH - BEHAVIORAL HEALTH SERVICES	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employmnt Discrmntn 213.111	(Date File Stamp)

**Summons in Civil Case**

**The State of Missouri to:** TRUMAN MEDICAL CENTER, INC.  
Alias:  
DBA: UNIVERSITY HEALTH - BEHAVIORAL HEALTH SERVICES

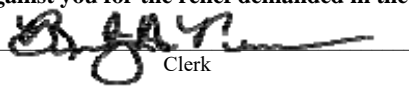
RA: JUSTUS, JOLIE L  
2301 HOLMES ST  
KANSAS CITY, MO 64108

**PRIVATE PROCESS SERVER**

**COURT SEAL OF**  
  
**JACKSON COUNTY**

**You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.**

25-FEB-2025  
Date

  
Clerk

Further Information:

**Sheriff's or Server's Return**

**Note to serving officer:** Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

☐ delivering a copy of the summons and petition to the defendant/respondent.

☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with \_\_\_\_\_ a person at least 18 years of age residing therein.

☐ (for service on a corporation) delivering a copy of the summons and petition to \_\_\_\_\_ (name) \_\_\_\_\_ (title).

☐ other \_\_\_\_\_.

Served at \_\_\_\_\_ (address)

in \_\_\_\_\_ (County/City of St. Louis), MO, on \_\_\_\_\_ (date) at \_\_\_\_\_ (time).

\_\_\_\_\_  
Printed Name of Sheriff or Server

\_\_\_\_\_  
Signature of Sheriff or Server

(Seal) **Must be sworn before a notary public if not served by an authorized officer:**

Subscribed and sworn to before me on \_\_\_\_\_ (date).

My commission expires: \_\_\_\_\_ Date \_\_\_\_\_ Notary Public

**Sheriff's Fees**

Summons \$ \_\_\_\_\_

Non Est \$ \_\_\_\_\_

Sheriff's Deputy Salary \$ \_\_\_\_\_

Supplemental Surcharge \$ 10.00

Mileage \$ \_\_\_\_\_ (\_\_\_\_\_ miles @ \$.\_\_\_\_\_ per mile)

**Total** \$ \_\_\_\_\_

A copy of the summons and petition must be served on **each** defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

## **SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION**

Under the Missouri e-filing system now utilized by the 16<sup>th</sup> Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT KANSAS CITY

STACIE MCCALL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No: 2516-CV04651
TRUMAN MEDICAL CENTER, INC. D/B/A )	)	
UNIVERSITY HEALTH - BEHAVIORAL )	)	
HEALTH SERVICES )	)	
	)	
	)	
	)	
	)	
Defendant.	)	

**RETURN OF SERVICE**

Pursuant to Mo.R.Civ.P 54.13, service of Summons and Petition by private process server was executed to Defendant on February 27, 2025, as evidenced by the attached affidavit.

Respectfully submitted,

  
\_\_\_\_\_  
Sarah J. Duggan #73687  
1600 Genessee St., Ste. 956  
Kansas City, MO 64102  
Tele: (816) 756-5458  
Fax: (816) 666-9596  
sduggan@brownandcurry.com

ATTORNEY FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that on March 10, 2025, the foregoing document was electronically filed with the Clerk of the Court using the electronic filing system which automatically transmits a Notice of Electronic Filing to all counsel of record.

/s/ Sarah J. Duggan

ATTORNEY FOR PLAINTIFFS

**AFFIDAVIT OF SERVICE**

State of Missouri

County of Jackson

Circuit Court

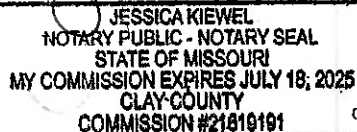
Case Number: 2516-CV04651

Plaintiff/Petitioner:  
**STACIE MCCALL**

vs.

Defendant/Respondent:  
**TRUMAN MEDICAL CENTER, INC.**Received by HPS Process Service & Investigations to be served on **Truman Medical Center, Inc., d/b/a University Health – Behavioral Health Services, RA: Jolie Justus, 2301 Holmes Street, Kansas City, MO 64108.**I, CHRISTOPHER REED, being duly sworn, depose and say that on the **27th day of February, 2025 at 10:40 am, I:**Served the within named establishment by delivering a true copy of **Summons in Civil Case; Petition for Damages; Exhibits; Notice of Case Management Conference for Civil Case and Order for Mediation; and Designation of Lead Attorney of Record to Amanda O'Neill, Associate General Counsel at the address of 2301 Holmes Street, Kansas City, MO 64108.**

I certify that I have no interest in the above action, am of legal age and have proper authority in the jurisdiction in which this service was made. I declare under penalty of perjury that the foregoing is true and correct.

Subscribed and Sworn to before me on the 6 day  
of Mar, 2025 by the affiant who is  
personally known to me.  
NOTARY PUBLIC

JESSICA KIEWEL  
NOTARY PUBLIC - NOTARY SEAL  
STATE OF MISSOURI  
MY COMMISSION EXPIRES JULY 18, 2025  
CLAY COUNTY  
COMMISSION #21819191

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CHRISTOPHER REED  
Process Server**HPS Process Service & Investigations**  
**www.hpsprocess.com**  
**1669 Jefferson**  
**Kansas City, MO 64108**  
**(800) 796-9559**

Our Job Serial Number: HAT-2025003192



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: PATRICK CHARLES EDWARDS	Case Number: 2516-CV04651
Plaintiff/Petitioner: STACIE MCCALL	Plaintiff's/Petitioner's Attorney/Address SARAH JESSICA DUGGAN 312 W KANSAS CITY, MO 64112
Defendant/Respondent: TRUMAN MEDICAL CENTER, INC. DBA: UNIVERSITY HEALTH - BEHAVIORAL HEALTH SERVICES	Court Address: 415 E 12th KANSAS CITY, MO 64106
Nature of Suit: CC Employment Discrimn 213.111	

(Date File Stamp)

**Summons in Civil Case**

The State of Missouri to: TRUMAN MEDICAL CENTER, INC.

Alias:

DBA: UNIVERSITY HEALTH - BEHAVIORAL HEALTH SERVICES

RA: JUSTUS, JOLIE L  
2301 HOLMES ST  
KANSAS CITY, MO 64108

COURT SEAL OF



JACKSON COUNTY

**PRIVATE PROCESS SERVER**

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for plaintiff/petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

25-FEB-2025

Date

*[Signature]*  
Clerk

Further Information:

**Sheriff's or Server's Return**

Note to serving officer: Summons should be returned to the court within 30 days after the date of issue.

I certify that I have served the above Summons by: (check one)

☐ delivering a copy of the summons and petition to the defendant/respondent.

☐ leaving a copy of the summons and petition at the dwelling place or usual abode of the defendant/respondent with a person at least 18 years of age residing therein.

☒ (for service on a corporation) delivering a copy of the summons and petition to

AMANDA O'NEILL (name) ASSOCIATE GENERAL COUNSEL (title).

☐ other

Served at 2301 HOLMES STREET KANSAS CITY, MO. 64108 (address)  
in JACKSON (County/City of St. Louis), MO, on 2-27-25 (date) at 10:40 (time).

CHRISTOPHER REED  
Printed Name of Sheriff or Server

Christopher Reed  
Signature of Sheriff or Server

(Seal)

Must be sworn before a notary public if not served by an authorized officer:

Subscribed and sworn to before me on 3/6/25 (date).

My commission expires: 7/18/25  
Date

Jessica Kiewel  
Notary Public

**Sheriff's Fees**

Summons \$

Non Est \$

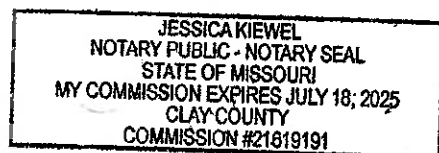
Sheriff's Deputy Salary

Supplemental Surcharge \$ 10.00

Mileage \$

Total \$

( miles @ \$. per mile)



A copy of the summons and petition must be served on each defendant/respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.